



Advocates for Workplace Fairness

October 23, 2023

Via CM/ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Apolonia Reyes De Paulino, et al. v. Extended At Home Care, Inc.*
Case No. 23-CV-4199 (RA)

Dear Judge Abrams:

Along with co-counsel, we represent Plaintiff Apolonia Reyes De Paulino and Opt-in Plaintiff Elsa Alvarez Cabrera in the above-referenced matter. We write pursuant to the Court's Individual Practice Rule I(D) to request an extension of the deadline to move for default judgment as set by the Court's October 19, 2023 Order. *See* ECF No. 19.

The Court's Order requires Plaintiff to move for default judgment by November 9, 2023. Plaintiff respectfully request a four-week extension until December 7, 2023 to move for default judgment in order to compile sufficient information for our submission to the Court and in light of conflicting litigation deadlines and planned vacation. This is Plaintiff's first request for an extension of this deadline. Since Defendant has not appeared in this case, Plaintiff's counsel is unable to seek Defendant's consent to extend this deadline.

Accordingly, Plaintiff requests an extension of the deadline to move for default judgment from November 9, 2023 to December 7, 2023.

Respectfully submitted,

A handwritten signature in black ink that reads "Molly Brooks".

Molly Brooks

C: All Counsel of Record (via ECF)

Application granted.

SO ORDERED.

A handwritten signature in black ink that reads "Hon. Ronnie Abrams".

Hon. Ronnie Abrams
October 24, 2023